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CIVIL DISTRICT COURT FOR THE PARISH OF EAST BATON ROUGE  
STATE OF LOUISIANA  
NO. C582129 DIVISION "D"  
MARIA CRUZ MALDONADO  
Individually and as representative of the ESTATE OF ULVALDO SOTO MARTINEZ,  
DECEASED, and as Next Friend and Natural Guardian of JUSTIN SOTO-MALDONADO  
AND USVALDO JESUS SOTO-MALDONADO,  
MINORS, AND GILBERTO SOTO MARTINEZ  
VERSUS  
KIEWIT LOUISIANA CO., MASSMAN CONSTRUCTION CO., TRAYLOR BROS.,  
INC., A JOINT VENTURE D/B/A KIEWIT MASSMAN TRAYLOR CONSTRUCTORS  
A/K/A KMTC JV, GEC LOUISIANA TIMED MANAGERS, A JOINT VENTURE  
PARTNERSHIP, PB AMERICAS, INC. F/K/A/ PARSONS, BRINCKERHOFF, QUADE  
& DOUGLAS, INC. AS PARTNER OF GEC LOUISIANA TIMED MANAGERS, A  
JOINT VENTURE PARTNERSHIP, LPA GROUP INCORPORATED AS PARTNER OF  
GEC LOUISIANA TIMED MANAGERS, A JOINT VENTURE PARTNERSHIP, G.E.C.  
INC. AS PARTNER OF GEC LOUISIANA TIMED MANAGERS, A JOINT VENTURE  
PARTNERSHIP, ZURICH AMERICAN INSURANCE COMPANY, THE STATE OF  
LOUISIANA THROUGH THE DEPARTMENT OF TRANSPORTATION AND  
DEVELOPMENT AND JL STEEL REINFORCING, LLC.  
  
UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION  
  
GUADALUPE ARENAS VARGAS, )  
Individually and As Representative of the )  
Estate of MARTIN ANASTACIO REYES )  
OSUNA, Deceased, and As Next Friend of )  
ZAID MARTIN REYES ARENAS; JUANA )  
SYLVIA OZUNA GARCIA; and MARTIN )  
REYES ADAME ) C.A. NO. 4:09-CV-02521  
  
V. )  
  
KIEWIT LOUISIANA CO., MASSMAN )  
CONSTRUCTION CO., and TRAYLOR )  
BROS., INC., a Joint Venture d/b/a KIEWIT ) JURY TRIAL DEMANDED  
MASSMAN TRAYLOR CONSTRUCTORS; )  
KIEWIT LOUISIANA CO.; MASSMAN )  
CONSTRUCTION CO.; and TRAYLOR )

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ORAL AND VIDEOTAPED DEPOSITION OF

MICHAEL CHARLES LAPOINTE

FEBRUARY 14, 2011

\*\*\*\*\*

ORAL AND VIDEOTAPED DEPOSITION OF MICHAEL CHARLES  
LAPOINTE, produced as a witness at the instance of the  
Plaintiffs, and duly sworn, was taken in the  
above-styled and numbered cause on the 14th day of  
February, 2011, from 9:22 a.m. to 6:59 p.m., before  
Mary Burkes, CSR in and for the State of Texas,  
reported by machine shorthand, at the law firm of  
Deutsch, Kerrigan & Stiles, 755 Magazine Street, Fifth  
Floor Conference Room, pursuant to Notice, and the  
Louisiana Rules of Civil Procedure and the provisions  
stated on the record or attached hereto.

1 THE VIDEOGRAPHER: Today's date is  
2 February 14th, 2011. We are on the record at 9:22.  
3 Start Tape 1.

4 MICHAEL CHARLES LAPOINTE,  
5 having been first duly sworn, was examined and  
6 testified as follows:

7 EXAMINATION

8 QUESTIONS BY MR. LYON:

9 Q. If you would please state your full name for  
10 us on the record.

11 A. Michael Charles LaPointe.

12 Q. And, Mr. LaPointe, where do you live?

13 A. I live in North Richland Hills, Texas.

14 Q. And do you live there with your family?

15 A. I -- with my wife, yes.

16 Q. Do you have a business there?

17 A. I do.

18 Q. And what's the name of the business?

19 A. JL Steel Reinforcing, LLC.

20 Q. And how long has JL Steel been in business?

21 A. Approximately 25 years.

22 Q. And who are the owners of JL Steel?

23 A. Right now, myself and my son.

24 Q. And your son's name?

25 A. Kyle LaPointe.

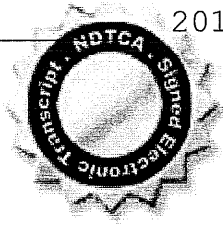
1 THE STATE OF TEXAS )

2 COUNTY OF HARRIS )

3 I, Mary Abbott Burkes, Certified Shorthand  
4 Reporter, duly commissioned and qualified in and for  
5 the State of Texas, do hereby certify that there came  
6 before me on February 14th, 2011, at Deutsch, Kerrigan  
7 & Stiles, L.L.P., 755 Magazine Street, New Orleans,  
8 Louisiana 70130, the following named person; to wit,  
9 MICHAEL CHARLES LAPOINTE, who was by me duly cautioned  
10 and sworn to testify to the truth and nothing but the  
11 truth of his knowledge touching and concerning the  
12 matters in this cause; and that said witness was  
13 thereupon carefully examined upon his oath and his  
14 examination reduced to writing under my supervision;  
15 that it is a true record of the testimony given by the  
16 said witness, that said witness requested review and  
17 signature of the deposition; that changes, if any, made  
18 by the witness were returned and are contained on the  
19 Correction Page attached to the original transcript.

20 I further certify that I am neither attorney  
21 for nor counsel for, nor related to nor employed by any  
22 of the parties in the action in which this statement is  
23 taken, and further that I am not a relative or employee  
24 of any attorney or counsel employed by the parties  
25 hereto, nor financially interested in this action.

1 IN WITNESS WHEREOF, I have hereunto affixed my  
2 hand and seal of office on this, the \_\_\_\_\_ day  
3 of \_\_\_\_\_ 2011.



4  
5 Mary Abbott Burkes

Mary Abbott Burkes,  
Certified Shorthand Reporter  
In and for the State of Texas  
Certification No. 5199

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